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July 10, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Cheryl L. Pollak, U.S.M.J.
225 Cadman Plaza East
Courtroom 13B South
Brooklyn, NY 11201-1804

Re: Ortega v. Champagne Room BK, Inc., et al.
Case No.: 1:21-cv-1125 (NGG) (CLP)

Dear Judge Pollak:

This office represents the Plaintiff Iluminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes consistent with this Court’s April 30, 2024 Order and June 14, 2024 Order granting an extension of time to provide a status report with respect to Plaintiff’s amendment of the pleadings as it relates to her claims under New York’s Wage Theft Prevention Act.

Plaintiff is prepared to amend the pleadings to satisfy the requirements of alleging a concrete injury and respectfully requests leave to do so pursuant to Rule 15 of the Federal Rules of Civil Procedure, and respectfully requests thirty (30) days to submit a motion for leave to amend.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
July 10, 2024

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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